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Attorneys for Defendant
FUJIAN JINHUA INTEGRATED CIRCUIT CO., LTD.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

20 UNITED STATES OF AMERICA,

CASE NO.: 3:18-cr-00465-MMC

21 Plaintiff.

**DECLARATION OF MATTHEW E.
SLOAN IN SUPPORT OF
DEFENDANT FUJIAN JINHUA
INTEGRATED CIRCUIT CO., LTD.
MOTION IN LIMINE NO. 4**

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Judge: The Honorable Maxine M. Chesney
Trial Date: February 14, 2022

23 UNITED MICROELECTRONICS CORPORATION, et al.

Defendants.

Hearing Date: January 18, 2022
Hearing Time: 10:00 a.m.

1 DECLARATION OF MATTHEW E. SLOAN

2 I, Matthew E. Sloan declare and state as follows:

3 1. I am a partner at Skadden, Arps, Slate, Meagher & Flom LLP, counsel of record for
4 Defendant Fujian Jinhua Integrated Circuit Co., Ltd. (“Jinhua”). I am an attorney licensed to practice
5 law in the State of California and before this Court. I submit this declaration in support of Jinhua’s
6 Motion *In Limine* No. 4 for an Order to Exclude The Forensic Images Of Certain Electronic Devices
7 (the “Motion”). This declaration is based upon my personal knowledge, and, if called to testify, I
8 could and would do so competently as to the matters set forth herein.

9 2. Attached hereto as Exhibit A is a true and correct copy of an English translation dated
10 November 27, 2017 of the Indictment Decision of Taiwan Taichung District Prosecutors Office
11 against JT Ho, Kenny Wang, Leh-Tian Rong, and United Microelectronics Corporation. The
12 translation was provided by the U.S. government when the document was produced to Jinhua.

13 3. Attached hereto as Exhibit B is a true and correct copy of an English translation of a
14 brief description provided by Le-wei Chen, a prosecutor at the Taichung District Prosecutors Office,
15 on the seizure of 26 electronic devices in February 2017. The translation was provided by the U.S.
16 government when the document was produced to Jinhua.

17 4. Attached hereto as Exhibit C is a true and correct copy of an English translation of
18 the Explanation Regarding Evidence Transfer of Taichung District Prosecutors’ Office of Taiwan on
19 March 16, 2020. The translation was provided by the U.S. government when the document was
20 produced to Jinhua.

21 5. Attached hereto as Exhibit D is a true and correct copy of (1) Lewei Chen’s Certificate
22 of Authenticity of Foreign Public Documents dated March 18, 2021, in Chinese and its English
23 translation; (2) the Certificate With Respect to Seized Items co-signed by Lewei Chen on March 18,
24 2021, and a forensic officer of the Ministry of Justice Investigation Bureau on March 17, 2021, whose
25 signature is illegible; (3) the Certificate of Authenticity of Forensic Images signed by Lewei Chen
26 and a forensic officer of the Ministry of Justice Investigation Bureau on March 18, 2021, whose
27 signature is illegible. The translations in this exhibit were provided by the U.S. government when it
28 produced the documents to Jinhua.

1 6. Attached hereto as Exhibit E is a true and correct copy of (1) Tianxing Zhang's
 2 Certificate of Authenticity of Foreign Public Documents dated March 13, 2020, in Chinese and its
 3 English translation; and (2) the Certificate With Respect to Seized Items signed by Huaiwen Xu,
 4 Tianxing Zhang, and a forensic officer of the Ministry of Justice whose signature is illegible. The
 5 translations in this exhibit were provided by the U.S. government when it produced the documents
 6 to Jinhua.

7 7. Attached hereto as Exhibit F is a true and correct copy of the Andrew Crain Expert
 8 Report ("Crain Report"), exclusive of any attached exhibits. Because the government marked
 9 Exhibit F as "Confidential," Jinhua must file it under seal pursuant to the Protective Order.
 10 Accordingly, Jinhua has filed a motion to file this exhibit under seal concurrently herewith, and
 11 attaches a redacted version of the Crain Report hereto.

12 8. Attached hereto as Exhibit G is a true and correct copy of the Expert Witness
 13 Disclosure of John F. Ashley ("Ashley Report"), exclusive of any attached exhibits. Because Exhibit
 14 G is "Confidential," Jinhua must file it under seal pursuant to the Protective Order. Accordingly,
 15 Jinhua has filed a motion to file this exhibit under seal concurrently herewith, and attaches a redacted
 16 version of the Ashley Report hereto.

17 I declare under penalty of perjury under the laws of the United States that the foregoing is
 18 true and correct. Executed on this 1st day of December, 2021 in Los Angeles, California.

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 20 By: _____ */s/ Matthew E. Sloan*

 Matthew E. Sloan

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